

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
Civil Action No. 5:22-cv-144-KDB-SCR**

JOHN DOE, a minor by his natural Father and guardian, JOE DOE,

Plaintiff,

WILKES COUNTY SCHOOLS BOARD OF EDUCATION,

Defendant.

**CONSENT PROTECTIVE ORDER**

Counsel for the parties herein stipulate to the entry of this Protective Order allowing release of confidential records of minor children to counsel for the parties herein based upon the following facts and conditions:

1. The Plaintiff, in the course of this action, has requested the release of the confidential records including those of minor children related to the incident which occurred on April 22, 2021, involving the Minor Plaintiff and other minor children.<sup>1</sup>
2. The confidential records of the minor children appear to be otherwise discoverable as it relates to the subject matter involved in this matter.
3. The following definitions apply herein:
  - a. “Confidential Materials” refers to the materials including, but not limited to, any records, statements, photographs and/or videos taken in conjunction with the investigation into the aforementioned incident or those individuals involved therewith.
  - b. “Document” means all writings, drawings, graphs, charts, recordings, and any other documents as defined in Rule 34 of the Federal Rules of Civil Procedure.
  - c. “Material” means any document, any answer to any interrogatory or other discovery request in this action, any portion of any deposition (including deposition

---

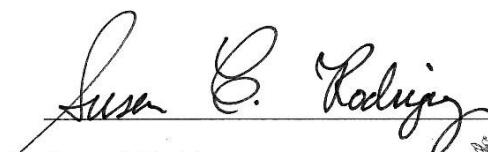
<sup>1</sup> The Court is informed there are materials sought to which relevancy/discoverability objections are anticipated by Defendant. The Parties have agreed that production of any such materials, with or without Order by this Court compelling production, shall also be subject to the terms of this same Consent Protective Order.

- exhibits) in this action, and any other information produced, given, or filed in this action.
- d. "Parties" means Plaintiff and Defendants in this action.
4. Counsel for the Defendant, after reviewing this file and related documents, has determined that they have no objection to producing the Confidential Materials to the parties for the following reasons:
- a. No policy reason exists for denial of the request of the parties for production of this material.
  - b. There is no prejudice to the Defendant by releasing this material.
  - c. Upon information or belief, any criminal investigation which might have been the subject of this file has been concluded.
5. Except as may be otherwise provided by further order of the Court, documents contained within the Confidential Materials shall be used for no purpose other than prosecuting or defending this action and shall be disclosed only to the persons identified below.
- a. The Court and its staff.
  - b. The parties and attorneys of record for the parties, and their legal assistants; other staff members, and law student clerks; insurers, their agents and employees; outside companies engaged by attorneys for the parties to photocopy such documents.
  - c. Any potential or actual deposition or trial witness when the documents are materially related to the questions asked to or testimony of such witness.
  - d. Mediators.
  - e. Consultants and technical experts involved in the preparation of this action.
  - f. Court reporters, their transcribers, assistants and employees.
  - g. The jury and trier of fact.
6. In addition, the above individuals and entities that are permitted access to the Confidential Materials and information are hereby ordered not to show, convey or reproduce any documents so designated or parts thereof, or copies thereof, or any matter contained therein, or any extracts or summaries thereof, to any individual, or to any entity that would not otherwise have access to said documents under the provisions of this Protective Order, except to the qualified persons listed above.

7. Counsel may make copies of material contained within the Confidential Materials for Plaintiffs or Defendants' experts upon receiving from said experts a written agreement that they will be bound by the terms of this Protective Order. The requirement of obtaining such an agreement shall be satisfied by having each of Plaintiffs or Defendants' experts read, acknowledge and agree in writing to be bound by this Protective Order. A file of all such written acknowledgments shall be maintained by Plaintiff and/or Defendants' counsel. By signing the declaration agreeing to be bound by this Protective Order, each of Plaintiffs or Defendants' experts submits himself or herself to the jurisdiction of the Court for purposes of enforcement of this Protective Order.
8. The production or disclosure of documents and materials in the Confidential Materials, pursuant to the terms of this Order, shall not waive or prejudice the right of any party to object to the production or admissibility of documents or information on any applicable grounds.
9. This Protective Order shall not prevent any party, from applying to the Court for relief from this Protective Order or from applying to the Court for further or additional Protective Orders, or from agreeing between themselves to modification of this Protective Order, subject to the approval of the Court.

**SO ORDERED.**

Signed: May 8, 2023



Susan C. Rodriguez  
United States Magistrate Judge



**AGREED TO BY:**

/s/John P. Wright

John P. Wright, NC Bar #55109  
Ryan D. Bolick, NC Bar #26482  
Cranfill Sumner LLP  
*Attorney for Defendant Wilkes County  
School System*  
P.O. Box 30787  
Charlotte, NC 28230  
Telephone (704) 332-8300  
Facsimile (704) 332-9994  
jwright@cshlaw.com

/s/Chantel Cherry-Lassiter

Chantel Cherry-Lassiter  
CCL Law Office, PLLC  
1851 W. Ehringhaus St. #136  
Elizabeth City, NC 27909  
chantelcherrylassiter@ccllaw.org  
*Attorney for Plaintiff*

/s/Amy E. Willbanks

Amy E. Willbanks  
Strom Law Firm, LLC  
6923 N. Trenholm Rd., Suite 200  
Columbia, SC 29206  
awillbanks@stromlaw.com  
*Attorney for Plaintiff*

/s/Chance D. Lynch

Chance D. Lynch  
Lynch Law, PLLC  
1015 A Roanoke Ave. Suite A  
Roanoke Rapids, NC 27870  
chancelynch@lynchlaw.org  
*Attorney for Plaintiff*